

EXHIBIT B

SYLVIA SHEN, 30B6 Vol. II
Telescopes Antitrust Litigation

March 05, 2024
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1 UNITED STATES DISTRICT COURT

2 FOR THE NORTHERN DISTRICT OF NEW YORK

3 ---00---

4 IN RE TELESCOPES ANTITRUST
5 LITIGATION

6 This document relates to: CASE NO. 5:20-CV-03639-EJD
7 Case No. 5:20-cv-03642-EJD
AURORA ASTRO PRODUCTS LLC,
PIONEER CYCLING & FITNESS, LLP,
JASON STEELE, AND THOSE
SIMILARLY SITUATED,

9 Plaintiffs,

10 vs.

11 CELESTRON ACQUISITION, LLC, SUZHOU
12 SYNTA OPTICAL TECHNOLOGY CO., LTD.,
SYNTA CANADA INT'L ENTERPRISES LTD.,
13 SW TECHNOLOGY CORP., OLIVON MANUFACTURING CO. LTD.,
OLIVON USA, LLC, NANTONG SCHMIDT OPTO-ELECTRICAL
TECHNOLOGY CO. LTD., NINGBO SUNNY ELECTRONIC CO.,
14 LTD. PACIFIC TELESCOPE CORP., COREY LEE, DAVID SHEN,
SYLVIA SHEN, JACK CHEN, JEAN SHEN, JOSEPH LUPICA,
15 DAVE ANDERSON, LAURENCE HUEN, and DOES 1-50,
Defendants.

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18 VIDEO-RECORDED DEPOSITION OF THE 30 (b)(6) OF
19 PACIFIC TELESCOPE CORP.

20 BY AND THROUGH SYLVIA SHEN, VOLUME II

21 San Francisco, California

22 Tuesday, March 5, 2024

23 Stenographically Reported by: Ashley Soevyn,
CSR No. 12019
24 ESQUIRE Job No. J10828594

25 Pages 108 - 213

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1 of the other employees that Synta Canada hired,
2 other than Mr. Liu?

3 MR. LIU: Asked and answered.

4 THE WITNESS: I believe there is another
5 name, Frank Liu.

6 BY MS. KUSHNIR:

7 Q Any others?

8 A Yes.

9 Q What are their names?

10 A Justin Liu.

11 Q Any others?

12 A I'm not sure.

13 Q Is there any familial relationship
14 between Eric, Frank or Justin?

15 MR. LIU: Objection. Vague and
16 ambiguous. Compound.

17 THE WITNESS: No.

18 BY MS. KUSHNIR:

19 Q What did Eric Liu do for Synta Canada?

20 A I don't have any understanding of that.

21 Q Well, you testified earlier that Synta
22 Canada hired these employees to conduct research for
23 Synta Canada. What type of research did they
24 conduct?

25 MR. LIU: Objection. Compound.

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1 THE WITNESS: I only know that they were
2 doing research and development work related to the
3 products. Also, as far as I remember, he was only
4 with the company for a short period of time.

5 BY MS. KUSHNIR:

6 Q Which products were Synta Canada's
7 employees doing research and development work for?

8 MR. LIU: Objection. Lacks foundation.
9 Calls for speculation.

10 THE WITNESS: I don't know that detail. 10:08:50

11 BY MS. KUSHNIR:

12 Q Are the products that you are speaking of
13 products that Celestron sold?

14 MR. LIU: Objection. Lacks foundation.
15 Calls for speculation. 10:09:14

16 THE WITNESS: Would you be able to
17 specify that question?

18 BY MS. KUSHNIR:

19 Q Sure.

20 You testified that Synta Canada's
21 employees were doing research and development work
22 related to products. Did those products belong to
23 Celestron?

24 MR. LIU: Objection. Vague and
25 ambiguous. Lacks foundation. Calls for 10:10:15

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1 things that Synta Canada developed belongs to Synta
2 Canada.

10:14:15

3 BY MS. KUSHNIR:

4 Q Did Synta Canada ever sell any products?

5 MR. LIU: Objection. Vague and
6 ambiguous. Lacks foundation. Calls for
7 speculation.

10:14:31

8 THE WITNESS: Synta Canada does not sell
9 telescopes.

10:15:08

10 BY MS. KUSHNIR:

11 Q Does Synta Canada sell any other products
12 other than telescopes?

13 MR. LIU: Same objections.

14 THE WITNESS: No.

15 BY MS. KUSHNIR:

16 Q Is it accurate to say then, that the
17 research and development work that Synta Canada's
18 employees did, were not put to any use by Synta
19 Canada?

10:15:35

20 MR. LIU: Objection. Lacks foundation.
21 Calls for speculation. Misstates prior testimony.

10:16:03

22 THE WITNESS: I believe there might be
23 some misunderstandings.

24 BY MS. KUSHNIR:

25 Q What do you think there is a

10:16:30

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1 REPORTER'S CERTIFICATE

2 I, ASHLEY SOEVYN, a Certified Shorthand
3 Reporter of the State of California, do hereby
4 certify:

5 That the foregoing proceedings were taken
6 before me at the time and place herein set forth;
7 at which time the witness was put under oath by me;

8 That the testimony of the witness, the
9 questions propounded, and all objections and
10 statements made at the time of the examination were
11 recorded stenographically by me and were thereafter
12 transcribed;

13 That a review of the transcript by the
14 deponent was/ was not requested;

15 That the foregoing is a true and correct
16 transcript of my shorthand notes so taken.

17 I further certify that I am not a relative
18 or employee of any attorney of the parties, nor
19 financially interested in the action.

20 I declare under penalty of perjury under
21 the laws of California that the foregoing is true
22 and correct. Dated this 14th day of March, 2024.

23 

24
25 ASHLEY SOEVYN
CSR No. 12019